

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

UNITED STATES OF AMERICA

v.

KULBIR KAUR,
Defendant:

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Case No. 3:23-cr-00092-REP

DEFENDANT KAUR’S POSITION ON TEXT AND VIDEO TRANSLATIONS

COMES NOW, Defendant, Kulbir Kaur, by and through counsel undersigned and pursuant to this Court’s order during the telephone conference on January 3, 2024, respectfully presents her position in reference to the Government’s proposed interpretation of the text messages and video of the argument inside the “Lovely Market” and offers the following;

Ms. Kaur does not object to the interpretations of the text messages.

Ms. Kaur does dispute the interpretation of the store video and asks that she be allowed to examine the interpreter in court.

Much of the dialogue is portrayed as “unintelligible” (“UI”) and overlapping (“OV”) due to background noise and overall poor sound quality. The combined effect of the many omissions in the dialogue and possible mistakes in translating the poor quality of the audio culminates in an inaccurate and misleading summary of the conversation.

Upon information and belief counsel believes the gist of the conversation to be Mr. Harmanpreet Singh being upset at “B.S” for stealing money and Mr. Harmanpreet Singh then threatening to shoot himself (not (“B.S”) in a theatrical display of emotion.

Wherefore Ms. Kaur respectfully requests that she be allowed to examine the interpreter for the accuracy of interpretation of the dialogue in the store video.

Respectfully Submitted,

Kulbir Kaur

_____/s/
By Counsel,

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CERTIFICATE OF SERVICE

I hereby certify that on January 4, 2024, I filed this Defendant Kaur's Position on Text and Video Interpretation via ECF with the Clerk of the Court, which will send a notification of such filing (NEF) to the all counsel of record.

_____/s/
By Counsel

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